

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE, et al.,)	
)	
Plaintiffs,)	No. 3:20-cv-01039
)	
v.)	Judge Campbell
)	Magistrate Judge Frensley
)	
WILLIAM LEE, et al.)	
)	
Defendants.)	

**DEFENDANTS’ REPLY IN SUPPORT OF THEIR JOINT
MOTION TO POSTPONE THE CASE MANAGEMENT CONFERENCE
AND STAY DISCOVERY**

Plaintiffs assert that they will be “substantially” prejudiced, if a stay of discovery is granted, because “any delay in discovery will serve as an impediment to Plaintiffs’ efforts to resolve their claims quickly and efficiently.” Plaintiffs’ Response, D.E. 39, at PageID# 247.

However, Tenn. Code Ann. §§ 40-29-201 through -205, have been on the books—unchanged—since 2006. Moreover, Plaintiffs, only now, have served Defendant Hargett with *another* written notification of alleged deficiencies in the Tennessee voter registration form. *See* Letter to Secretary Tre Hargett, dated 1/27/21 (D.E. 29-2). Even if Plaintiffs’ assertions in that letter are meritorious, Defendants—by statute—have *90 days* to correct the alleged violations. *See* 52 U.S.C. § 20510(b)(2).

Thus, Defendants’ Joint Motion does not present a justice-delayed-is-justice-denied circumstance, and no harm (let alone “substantial” harm) will be visited upon Plaintiffs by the requested stay.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing documents have been forwarded electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to the parties named below. Parties may access this filing through the Court's electronic filing system.

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